

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

DONALD J. TRUMP, Candidate for President of
the United States of America,

Plaintiff,

Case No. 2:20-cv-01785-BHL

vs.

THE WISCONSIN ELECTIONS
COMMISSION, et al.,

Defendants,

and

WISCONSIN STATE CONFERENCE NAACP,
et al.,

Intervenor-Defendants.

**NOTICE OF MOTION AND MOTION TO DISMISS COMPLAINT OF INTERVENOR-
DEFENDANTS WISCONSIN STATE CONFERENCE NAACP, DOROTHY HARRELL,
WENDELL J. HARRIS, SR., AND EARNESTINE MOSS**

NOW COME Intervenor-Defendants Wisconsin State Conference NAACP, Dorothy Harrell, Wendell J. Harris, Sr., and Earnestine Moss (collectively “Wisconsin NAACP”), and respectfully move this Court, by and through Wisconsin NAACP’s attorneys Laffey, Leitner & Goode LLC and the Lawyers’ Committee for Civil Rights Under Law, for an order dismissing the Complaint, pursuant to Fed. R. Civ. P. 12(b)(1) for lack of subject matter jurisdiction and pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief can be granted.

Grounds for this motion are set forth in the accompanying brief filed in support of this motion.

Dated this 8th day of December 2020.

s/ Joseph S. Goode

Joseph S. Goode (WI State Bar No. 1020886)

Mark M. Leitner (WI State Bar No. 1009459)

John W. Halpin (WI State Bar No. 1064336)

Allison E. Laffey (WI State Bar No. 1090079)

LAFFEY, LEITNER & GOODE LLC

325 E. Chicago Street, Suite 200

Milwaukee, WI 53202

(414) 312-7003 Phone

(414) 755-7089 Facsimile

jgoode@llgmke.com

mleitner@llgmke.com

jhalpin@llgmke.com

alaffey@llgmke.com

Kristen Clarke (*admission pending*)

Jon Greenbaum

Ezra Rosenberg

Ajay Saini (*admission pending*)

Jacob Conarck

Ryan Snow (*admission pending*)

LAWYERS' COMMITTEE FOR CIVIL RIGHTS
UNDER LAW

1500 K Street NW, 9th Floor

Washington, DC 20005

(202) 662-8315 (phone)

(202) 783-0857 (fax)

kclarke@lawyerscommittee.org

jgreenbaum@lawyerscommittee.org

erosenberg@lawyerscommittee.org

asaini@lawyerscommittee.org

jconarck@lawyerscommittee.org

rsnow@lawyerscommittee.org

*Attorneys for Intervenor-Defendants Wisconsin
State Conference NAACP, Dorothy Harrell,
Wendell J. Harris, Sr., and Earnestine Moss*